

MICHAEL J. AGOGLIA (CA SBN 154810)
WENDY M. GARBERS (CA SBN 213208)
MAgoglia@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

Attorneys for Defendants
GMAC LLC, CAP RE OF VERMONT, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KARAM SINGH BADESHA, FELICIA
FOLMAR, LORI GARRETT, and DONNA
MOORE, individually and on behalf of all other
similarly situated,

Plaintiffs,

v.

GMAC LLC, CAP RE OF VERMONT, INC.,

Defendants.

Case No. C06-07817

**STIPULATION AND
[PROPOSED] ORDER
EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

It is hereby stipulated by and between plaintiffs Karam Singh Badesha, Felicia Folmar, Lori Garrett and Donna Moore and defendants GMAC LLC and Cap Re Of Vermont, Inc., through their respective attorneys as follows:

1. Defendants' responsive pleadings are currently due on February 15, 2007;
2. Defendants were previously represented by Severson & Werson, but have just recently retained new counsel, Morrison & Foerster LLP, to represent them;
3. Plaintiffs and defendants have thus agreed to extend defendants' time to respond to the complaint herein;

4. Pursuant to this stipulation, defendants' GMAC LLC and Cap Re Of Vermont, Inc.'s response to the complaint will be filed and served on or before March 30, 2007.

Dated: February 14, 2007

MICHAEL J. AGOGLIA
WENDY M. GARBERS
MORRISON & FOERSTER LLP

By: /s/Michael J. Agoglia
Michael J. Agoglia

Attorneys for Defendants
GMAC LLC, CAP RE OF VERMONT,
INC.

Dated: February 14, 2007

ALAN R. PLUTZIK
ROBERT M. BRAMSON
JOSEPH H. MELTZER
EDWARD W. CIOLKO
JOSEPH A. WEEDEN
SCHIFFRIN & BARROWAY LLP

By: /s/Alan R. Plutzik
Alan R. Plutzik

Attorneys for Plaintiffs

[PROPOSED] ORDER

IT IS HEREBY ORDERED, pursuant to the parties' stipulation, that defendants' GMAC LLC and Cap Re Of Vermont, Inc.'s time within which to respond to the complaint in this case shall be extended to and including March 30, 2007.

Dated: Feb. 15, 2007


Magistrate Judge Joseph C. Spero

GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from each of the other signatories and I shall maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party.

/s/Michael J. Agoglia
Attorney for Defendant